

WYPDES Inspection Process For Coal Bed Methane Facilities



READ YOUR PERMIT!!!!

- The majority of the non-compliance issues inspectors find during inspections result from permittees not completely reading their permits.
- Don't assume if you read one permit that your other permit(s) have the same requirements written into them.
- Permits may have the same requirements but they may be written in different areas of the permit.

What To Expect When You Get An Inspection

- Inspections typically involve a review of the records and a field inspection of the facility.
- There may be inspections where only the records or the field inspections will be conducted.
- Keep your records organized. Records must be retained for 3 years. Inspectors get cranky if they have to organize your records in order to do a review.

During The Records Review

- The records review is basically a QA/QC check of the information reported on the Discharge Monitoring Reports (DMR's) and the laboratory reports.
- Enforcement actions due to exceedances reported on the DMR's are generated by the WDEQ compliance staff and not the inspectors. Enforcement actions due to QA/QC issues are generated by the inspectors
- If groundwater monitoring and/or reservoir bonding is required by the permit, approval will be verified at this time.

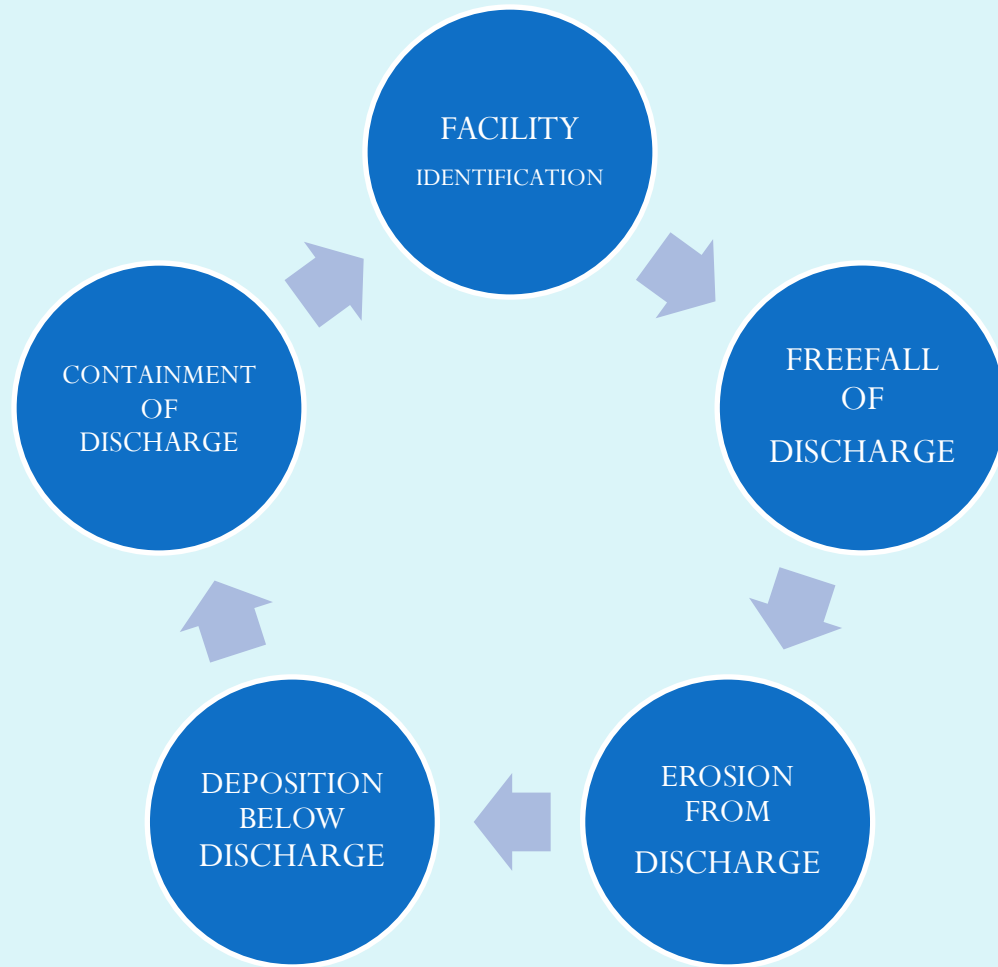
In The Field



Field Inspections

- Expect the inspector to sample a minimum of 3 outfalls or 20% of the outfalls depending on the number of outfalls permitted for a facility. All constructed outfalls will be visited during the inspection.
- This is not written in stone. An inspector may want to do additional sampling if they suspect there may be water quality issues at other outfalls.
- An inspector will want to visit the outfalls even if they are not discharging.

What Are Inspectors Looking For?



Facility Identification Signs

- All facilities shall be clearly identified with an all weather sign with the following information.
 - Name of company, corporation, person(s) who hold the permit, and the WYPDES permit number.
 - The contact name and phone number of the person responsible for the records.
 - The name of the facility (lease, well number, etc.) and the outfall number.

Signs

- Signs vary from company to company. The important thing is that they have the information on them that is needed.



Different Sizes, Shapes, and Information



Signs, Signs, Everywhere a Sign



Freefall of Discharges

- Reasons a freefall is needed.
 - A freefall insures that a representative sample can be collected of the water being discharged.
 - A freefall insures you can obtain an accurate flow rate.
 - An unobstructed freefall helps to insure you are not adding anything to your sample that could put you out of compliance.

Improperly Constructed Outfalls













Freefalls That Work For Us









➡ Field Analysis Requirements

- ★ Using a calibrated meter, pH must be analyzed in the field.
- ★ Filtration of samples must occur immediately after the samples are collected.



Erosion From Discharges

- The permit states that all waters shall be discharged in a manner to prevent erosion, scouring, or damage to stream banks, stream beds, ditches, or other waters of the state at the point of discharge.





No Significant Deposition or Degradation Below Outfall. What The Heck Are You Talking About?

A lot of discharge points have iron staining on the rocks below the outfall. Is this a violation of the permit?



Iron staining does occur frequently below discharges and is normally not a major issue.



It does become an issue when the staining is extensive and the collected sample show you are in non-compliance with your permit.



Containment Units

- Monitoring and visual assessment of full containment reservoirs.
- Full containment reservoirs must maintain sufficient freeboard to contain the specified precipitation event identified in the permit.
- Flowing seeps into waters of the state from full containment reservoirs/pits is NOT allowed.

Discharge Options

Option 2

Option 1B

Option 1A

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Option 2

- Contain all effluent in on-channel reservoir
- Can only overtop in response to natural precipitation
- Limited to natural overtopping and shall not extend beyond 48 hrs
- Additional release from the reservoir is not authorized
- Intentional discharges will be considered a violation
- More stringent monitoring requirements







Option 1B

- Prohibits discharge except in the event of 50yr/24hr storm
- Limited to natural overtopping and 48 hour duration
- Verification of storm event the responsibility of permittee
- Effluent that reaches a flow monitoring point, outside of a 50 year/24 hour storm event or greater, is not allowed.
- Additional release not authorized
- Staff gage marking the 50 year 24 hr. storm freeboard capacity









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WY0053961
FM001



Option 1A

- Off-channel man-made containment units
- Intentional discharge is prohibited
- Overtopping allowed as result of 50yr/24hr event or greater
- Permittee's responsibility to verify storm event
- Containment unit monitoring
- Staff gages marking the 50yr/24hr storm freeboard capacity
- Least stringent effluent monitoring











Beneficial Use

Land application

- Must meet permit limitations at the outfall
- Must come from the reservoir, not wellhead
- Can not reach waters of the state







Seeps

Water may not be intentionally discharged from reservoirs. Reservoirs may discharge water in response to storm events or upstream reservoir overflow. Seepage of the discharge water from on-channel reservoirs to the extent that a continuous flow of discharge water occurs in the receiving stream below the reservoir is prohibited. The permittee will be required to cease discharge into the seeping reservoir until the seep is corrected.

























Completing The Inspection Process

- Compliance monitoring water quality samples collected are sent to the DEQ laboratory for analysis.
- The inspection report is written summarizing the inspection. The report includes analytical results, photographs and a site location map.
- The inspection report along with other pertinent correspondence is sent to the permit file, EPA Region 8 and the permittee.
- If a letter of violation is issued, the permittee must respond within the timeframe provided with the information requested.
- If elevated enforcement is required, enforcement personnel will address the issues.

AND FINALLY

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